

EXHIBIT H

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION) Case No.

) 1:17-MD-2804

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10 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
11 ALL CASES)
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16 Friday, December 14, 2018
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23
24 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
25 CONFIDENTIALITY REVIEW
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33 Videotaped Deposition of PATSY LITTLE,
34 held at Stone Pigman Walther Wittmann LLC,
35 909 Poydras, Suite 3150, New Orleans,
36 Louisiana, commencing at 8:06 a.m., on the
37 above date, before Michael E. Miller, Fellow
38 of the Academy of Professional Reporters,
39 Registered Diplomate Reporter, Certified
40 Realtime Reporter and Notary Public.
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54 GOLKOW LITIGATION SERVICES
55 877.370.3377 ph | 917.591.5672 fax
56 deps@golkow.com

1 will now swear in the witness.

2 PATSY LITTLE,

3 having been duly sworn,

4 testified as follows:

5 EXAMINATION

6 BY MR. BOWER:

7 Q. Good morning, Ms. Little. How
8 are you today?

9 A. Good morning. Great.

10 Q. Thank you for being here. We
11 appreciate it.

12 Have you ever been deposed
13 before?

14 A. I have not.

15 Q. You have not, okay. So I'm
16 sure your counsel went over a few ground
17 rules for you, but just so we're all on the
18 same page, let's talk about that for a
19 minute.

20 I need you to answer if it's a
21 yes-or-no question verbally, so in other
22 words, don't nod your head, so the court
23 reporter can take down your answer. Do you
24 understand that?

25 A. Yes, I do.

2 I worked at St. Elizabeth Hospital and I
3 worked for Infusion Network.

5 Then in 2005 you went to
6 Louisiana State to get your master's degree,
7 correct?

9 Q. Did you begin working with
10 Walmart directly after graduating with your
11 master's degree?

14 Q. And what were you hired at
15 Walmart to do?

16 A. To be a buyer in the pharmacy
17 department.

The diagram illustrates a sequence of 10 rows of data. Each row is represented by a vertical bar on the left and a horizontal bar on the right. The horizontal bars vary in length and position, indicating different data values for each row. The rows are numbered 1 through 10.

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█ [REDACTED] [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

8 Q. What's your basis for that
9 statement?

10 A. Because we never did anything
11 that would promote an opioid to the customer,
12 to the end customer user, the patient that
13 would pick up the prescription.

14 Q. And how do you know that?

15 A. Because we had a pretty firm
16 stance on that while I was there.

17 Q. And where did you learn of that
18 stance?

19 A. I had asked to put a cough
20 medicine on the \$4 program at one time and
21 was told that anything with controlled
22 substances, we generally would not advertise
23 or talk to the consumer about.

█ [REDACTED] [REDACTED]

█ [REDACTED]